

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

TATUNG COMPANY; TATUNG
COMPANY OF AMERICA, INC.;
CHUNGHWA PICTURE TUBES, LTD.;
AND VIEWSONIC CORPORATION,

Defendants.

Civil Action No. 05-292 (JJF)

PLAINTIFF'S PROPOSED VERDICT FORM

Pursuant to D. Del. LR 51.1(c), plaintiff LG.Philips LCD Co. Ltd. ("LPL")
submits the following proposed special verdict form.

July 4, 2006

THE BAYARD FIRM

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LG.PHILIPS LCD CO., LTD.

QUESTION NO. 1:

- A. Do you find by a preponderance of the evidence that Chunghwa Picture Tubes, Ltd.'s ("CPT") LCD modules designated _____ (CPT Modules containing inner guard rings) literally infringe any of the claims of the '002 patent?

Answer "Yes" or "No" for each claim listed below.

'002 Patent		
CLAIM	YES (Infringes)	NO (Does Not Infringe)
Claim 1		
Claim 2		
Claim 3		
Claim 4		
Claim 5		
Claim 6		
Claim 7		
Claim 8		
Claim 9		
Claim 12		
Claim 13		
Claim 14		
Claim 15		
Claim 16		
Claim 17		
Claim 18		

- B. Do you find by a preponderance of the evidence that the CPT LCD modules designated _____ (CPT Modules inner guard rings) infringe, under the doctrine of equivalents, any of the claims of the '002 patent?

Answer "Yes" or "No" for each claim listed below.

'002 Patent		
CLAIM	YES (Infringes)	NO (Does Not Infringe)
Claim 1		
Claim 2		
Claim 3		
Claim 4		
Claim 5		
Claim 6		
Claim 7		
Claim 8		
Claim 9		
Claim 12		
Claim 13		
Claim 14		
Claim 15		
Claim 16		
Claim 17		
Claim 18		

QUESTION NO. 2:

- A. Do you find by a preponderance of the evidence that the CPT LCD modules designated _____ (CPT Modules containing outer guard rings) literally infringe any of the claims of the '002 patent?

Answer "Yes" or "No" for each claim listed below.

'002 Patent		
CLAIM	YES (Infringes)	NO (Does Not Infringe)
Claim 1		
Claim 2		
Claim 3		
Claim 4		
Claim 5		
Claim 6		
Claim 7		
Claim 8		
Claim 9		
Claim 12		
Claim 13		
Claim 14		
Claim 15		
Claim 16		
Claim 17		
Claim 18		

- B. Do you find by a preponderance of the evidence that the CPT LCD modules designated _____ (CPT Modules containing outer guard rings) infringe, under the doctrine of equivalents, any of the claims of the '002 patent?

Answer "Yes" or "No" for each claim listed below.

'002 Patent		
CLAIM	YES (Infringes)	NO (Does Not Infringe)
Claim 1		
Claim 2		
Claim 3		
Claim 4		
Claim 5		
Claim 6		
Claim 7		
Claim 8		
Claim 9		
Claim 12		
Claim 13		
Claim 14		
Claim 15		
Claim 16		
Claim 17		
Claim 18		

QUESTION NO. 3:

- A. Do you find by a preponderance of the evidence that the CPT LCD modules designated _____ (CPT Modules containing inner and outer guard rings) literally infringe any of the claims of the '002 patent?

Answer "Yes" or "No" for each claim listed below.

'002 Patent		
CLAIM	YES (Infringes)	NO (Does Not Infringe)
Claim 1		
Claim 2		
Claim 3		
Claim 4		
Claim 5		
Claim 6		
Claim 7		
Claim 8		
Claim 9		
Claim 12		
Claim 13		
Claim 14		
Claim 15		
Claim 16		
Claim 17		
Claim 18		

- B. Do you find by a preponderance of the evidence that the CPT LCD modules designated _____ (CPT Modules containing inner and outer guard rings) infringe, under the doctrine of equivalents, any of the claims of the '002 patent?

Answer "Yes" or "No" for each claim listed below.

'002 Patent		
CLAIM	YES (Infringes)	NO (Does Not Infringe)
Claim 1		
Claim 2		
Claim 3		
Claim 4		
Claim 5		
Claim 6		
Claim 7		
Claim 8		
Claim 9		
Claim 12		
Claim 13		
Claim 14		
Claim 15		
Claim 16		
Claim 17		
Claim 18		

IF YOU HAVE ANSWERED "YES" TO ANY CLAIM LISTED IN QUESTION NOS. 1-3, THEN ANSWER QUESTION NOS. 4 THROUGH 7. OTHERWISE, PROCEED TO QUESTION NOS. 9 AND 10, AND DO NOT ANSWER QUESTION NO. 11. THE JURY FOREPERSON SHOULD THEN SIGN AND DATE THE VERDICT FORM AND RETURN IT TO THE SECURITY OFFICER.

QUESTION NO. 4:

- A. Do you find by a preponderance of the evidence that Chunghwa Picture Tubes, Ltd. has made, used, sold, or offered for sale in the United States, or imported into the United States, any infringing CPT LCD Modules or any completed LCD display product (for example, a laptop computer, an LCD monitor, an LCD television, or an open frame LCD device) that contains an infringing CPT LCD Module?

Answer "Yes" or "No" below.

Yes (Infringement): _____ No: (No Infringement): _____

- B. Do you find by a preponderance of the evidence that Chunghwa Picture Tubes, Ltd. has actively induced anyone to make, use, sell, or offer for sale in the United States, or to import into the United States, any infringing CPT LCD Modules or any completed LCD display product (for example, a laptop computer, an LCD monitor, an LCD television, or an open frame LCD device) that contains an infringing CPT LCD Module?

Answer "Yes" or "No" below.

Yes (Infringement): _____ No: (No Infringement): _____

QUESTION NO. 5:

- A. Do you find by a preponderance of the evidence that Tatung Company has made, used, sold, or offered for sale in the United States, or imported into the United States, any infringing CPT LCD Modules or any completed LCD display product (for example, a laptop computer, an LCD monitor, an LCD television, or an open frame LCD device) that contains an infringing CPT LCD Module?

Answer "Yes" or "No" below.

Yes (Infringement): _____ No: (No Infringement): _____

- B. Do you find by a preponderance of the evidence that Tatung Company has actively induced anyone to make, use, sell, or offer for sale in the United States, or to import into the United States, any infringing CPT LCD Modules or any completed LCD display product (for example, a laptop computer, an LCD monitor, an LCD television, or an open frame LCD device) that contains an infringing CPT LCD Module?

Answer "Yes" or "No" below.

Yes (Infringement): _____ No: (No Infringement): _____

QUESTION NO. 6:

- A. Do you find by a preponderance of the evidence that Tatung Company of America has made, used, sold, or offered for sale in the United States, or imported into the United States, any infringing CPT LCD Modules or any completed LCD display product (for example, a laptop computer, an LCD monitor, an LCD television, or an open frame LCD device) that contains an infringing CPT LCD Module?

Answer "Yes" or "No" below.

Yes (Infringement): _____ No: (No Infringement): _____

- B. Do you find by a preponderance of the evidence that Tatung Company of America has actively anyone to make, use, sell, or offer for sale in the United States, or to import into the United States, any infringing CPT LCD Modules or any completed LCD display product (for example, a laptop computer, an LCD monitor, an LCD television, or an open frame LCD device) that contains an infringing CPT LCD Module?

Answer "Yes" or "No" below.

Yes (Infringement): _____ No: (No Infringement): _____

QUESTION NO. 7:

- A. Do you find by a preponderance of the evidence that ViewSonic Corporation has made, used, sold, or offered for sale in the United States, or imported into the United States, any infringing CPT LCD Modules or any completed LCD display product (for example, a laptop computer, an LCD monitor, an LCD television, or an open frame LCD device) that

contains an infringing CPT LCD Module?

Answer "Yes" or "No" below.

Yes (Infringement): _____ No: (No Infringement): _____

- B. Do you find by a preponderance of the evidence that ViewSonic Corporation has actively induced anyone to make, use, sell, or offer for sale in the United States, or to import into the United States, any infringing CPT LCD Modules or any completed LCD display product (for example, a laptop computer, an LCD monitor, an LCD television, or an open frame LCD device) that contains an infringing CPT LCD Module?

Answer "Yes" or "No" below.

Yes (Infringement): _____ No: (No Infringement): _____

IF YOU HAVE ANSWERED "YES" TO ANY OF QUESTION NOS. 4 THROUGH 7, THEN ANSWER QUESTION NOS. 8 THROUGH 10. OTHERWISE, PROCEED TO QUESTION NOS. 9 AND 10, AND DO NOT ANSWER QUESTION NO. 8 OR QUESTION NO. 11. THE JURY FOREPERSON SHOULD THEN SIGN AND DATE THE VERDICT FORM AND RETURN IT TO THE SECURITY OFFICER.

QUESTION NO. 8:

Do you find by clear and convincing evidence that any defendant's infringement of the claims of the patents in suit was willful? Answer "Yes" or "No" for each Defendant below.

	YES (Willful Infringement)	NO (Not Willful Infringement)
Chunghwa Picture Tubes		
Tatung Company		
Tatung Company of America		
ViewSonic Corporation		

QUESTION NO. 9:

Have Defendants proven by clear and convincing evidence that any of the claims of the '002 Patent are invalid by anticipation?

Answer "Yes" or "No" for each claim listed below.

'002 Patent		
CLAIM	YES (Invalid)	NO (Not Invalid)
Claim 1		
Claim 2		
Claim 3		
Claim 4		
Claim 5		
Claim 6		
Claim 7		
Claim 8		
Claim 9		
Claim 12		
Claim 13		
Claim 14		
Claim 15		
Claim 16		
Claim 17		
Claim 18		

If your answer to any of the claims listed in Question No. 9, is "Yes," specifically identify the single prior reference that anticipate that claim:

QUESTION NO. 10:

Have Defendants proven by clear and convincing evidence that any of the claims of the '002 Patent are invalid for obviousness?

Answer "Yes" or "No" for each claim listed below.

'002 Patent		
CLAIM	YES (Invalid)	NO (Not Invalid)
Claim 1		
Claim 2		
Claim 3		
Claim 4		
Claim 5		
Claim 6		
Claim 7		
Claim 8		
Claim 9		
Claim 12		
Claim 13		
Claim 14		
Claim 15		
Claim 16		
Claim 17		
Claim 18		

If your answer to any of the claims listed in Question No. 10, is "Yes," specifically identify the combination or combinations of references that you find makes the claim obvious:

IF YOU HAVE FOUND INFRINGEMENT OF A VALID CLAIM, PLEASE ANSWER QUESTION 11. IF YOU HAVE NOT FOUND INFRINGEMENT OR YOU HAVE FOUND INFRINGEMENT ONLY OF A CLAIM YOU HAVE FOUND TO BE INVALID, DO NOT ANSWER QUESTION NO. 11. THE JURY FOREPERSON SHOULD THEN SIGN AND DATE THE VERDICT FORM AND RETURN IT TO THE SECURITY OFFICER.

QUESTION NO. 11:

What sum of money, if paid now in cash, would fairly and adequately compensate the plaintiff for infringement?

Answer: _____

Signed this ____ day of July, 2006.

Jury Foreperson

CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on July 4, 2006, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

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The undersigned counsel further certifies that copies of the foregoing document were sent on July 4, 2006 by email and by hand to the above counsel and by email and first class mail to the following non-registered participants:

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